

Sample 30(b)(6) Deposition Notice: Custodian(s) of Electronic Records A10

Identify and make available for deposition the person(s) responsible for the ongoing operation, maintenance, data security, expansion, backup, and upkeep of [party's] computer system. Provide the names and addresses of outsource computer facility managers or contractors if used. These individuals should be prepared to address the following:

1. Provide a description of the number and type of mainframes, mini-computers, local area network and widearea network servers, desktop and laptop computers in use at [Party's], and home computers used by [Party's] employees for [Party's] related work.
2. Provide a description of the type of operating system(s) and application software used on all of [Party's] computer systems.
3. Provide information concerning [Party's] data security systems and procedures for all of [Party's] computers.
4. Provide information concerning [Party's] backup schedule, tape rotation, tape retention, and data destruction procedures and policies for all of [Party's] computers.
5. Provide information concerning the maintenance methods, procedures, and policies for all [Party's] computers, including information regarding the disposition of used computers and computer parts.
6. Provide information concerning the type of electronic mail system(s) used by [Party's] personnel, electronic mail retention schedules, and any guidelines or policies issued to [Party's] personnel concerning the use of electronic mail.
7. Provide information concerning any Internet gateways or software used to connect [Party's] computer system with the Internet, and any guidelines or policies issued to [Party's] personnel concerning employee use of the Internet.
8. Provide information concerning any word processing systems, database management systems, project management software, electronic spreadsheet and _____ software used by [Party's] personnel, and any file retention schedules, including any guidelines or policies issued to [Party's] personnel concerning the use of such software.